

1 MICHAEL A. JACOBS (CA SBN 111664)  
MJacobs@mofo.com  
2 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
3 ERIC A. TATE (CA SBN 178719)  
ETate@mofo.com  
4 RUDY Y. KIM (CA SBN 199426)  
RKim@mofo.com  
5 MORRISON & FOERSTER LLP  
425 Market Street  
6 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
7 Facsimile: 415.268.7522

8 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsflp.com  
9 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsflp.com  
10 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
11 Washington, D.C. 20005  
Telephone: 202.237.2727  
12 Facsimile: 202.237.6131

13 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC.'S AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS AND  
EXHIBITS TO DEFENDANTS' REPLY  
IN SUPPORT OF MOTION TO  
ENFORCE THE COURT'S JUNE 7,  
2017 ORDER**

Judge: Hon. William H. Alsup  
Trial Date: October 10, 2017

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this administrative motion for an order to file under seal portions of and exhibits to Uber’s Reply in Support Of Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563), to Strike Plaintiff Waymo LLC’s Corrected Supplemental Initial Disclosures, and to Preclude Damages Claims and Certain Witnesses. Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Defendant Uber Technologies, Inc. and Ottomotto, LLC’s Reply in Support of Motion to Enforce the Court’s June 7, 2017 Order (Dkt. 563), to Strike Plaintiff Waymo LLC’s Corrected Supplemental Initial Disclosures, and to Preclude Damages Claims And Certain Witnesses (“Reply”)	Highlighted Portions	Plaintiff
Exhibit 2 to Dearborn Decl.	Highlighted Portions	Plaintiff
Exhibit 4 to Dearborn Decl.	Entire Document	Plaintiff

The highlighted portions of the Reply and Exhibit 2 and the entirety of Exhibit 4 contain information designated by Waymo as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order. (*See* Decl. of Meredith Dearborn in Support of Uber’s Administrative Motion to File Documents Under Seal ¶ 3.)

Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the documents at issue, with accompanying chamber copies. Uber served Waymo with this motion on July 24, 2017.

For the foregoing reasons, Uber request that the Court enter the accompanying Proposed Order granting this administrative motion to file documents under seal and designate the service copies of these documents as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only.”

//

//

//

1 Dated: July 24, 2017

BOIES SCHILLER FLEXNER LLP

2 By: /s/ Karen L. Dunn

3 Karen L. Dunn

4 Counsel for Defendants  
5 UBER TECHNOLOGIES, INC. AND  
6 OTTOMOTTO LLC  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28